

P.O. Box 1585  
Erie, PA 16507

December 29, 2005

Mark J. Kuhar, Esq.  
120 West Tenth Street  
Erie, PA 16501-1461

Re: Wagner (vs) Crawford Central School District (No. 04-264-E)

Dear Mr. Kuhar:

I am submitting to you a Demand Letter setting forth the proposed terms and conditions which my client, Rowena Wagner, is willing to consider in reaching a settlement in the captioned matter. I acknowledge the recent telephone conversation in which we discussed the possible terms and conditions that such a agreement might embody.

In this regard, my client has authorized me to propose the following:

- (1) Back Pay  
My client wishes to be made whole by full recovery of those economic losses and damages specified in the Second Amended Complaint that she sustained due to unlawful discrimination and hiring practices of the Defendants. Back pay awards include wages and salary, fringe benefits, pre-judgment interest, and post-judgment interest.
- (2) Employment  
The Plaintiff seeks to be assigned or placed in an elementary teaching position in the Crawford Central School District which is suitable to her professional background. In order to be made whole, the settlement agreement should reflect the seniority and bidding rights and attendant benefits that would have accrued to Plaintiff under the collective bargaining agreement, had Plaintiff's teaching career not been thwarted and denied as a result of discrimination.
- (3) Attorney Fees  
The Plaintiff also seeks reasonable attorney fees and costs associated with this lawsuit.
- (4) Crawford Central Education Association  
The Plaintiff is amenable to discussing the prospects of settlement with the Association. However, unless and until the Association indicates a serious interest in settlement, Plaintiff shall continue to pursue against the Association the remedies, damages and relief specified In the Second Amended Complaint.

- (5) Plaintiff insists that any settlement agreement reached with the Defendants should be consummated under the auspices of the Court in the form of a Consent Decree which contains the terms and conditions that are mutually agreed upon. The Court would be requested to monitor the Consent Decree for compliance purposes. It is also Plaintiff's belief that the Consent Decree should embody provisions which provide for a Diversity Plan that facilitates diversity of the teaching staff of Crawford Central School District.

Please feel free to call if you have questions.

Very truly yours,

  
Caleb Nichols